

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
LERNOUT & HAUSPIE SPEECH)	Case No. 00-4398 (JHW)
PRODUCTS N.V.,)	(Jointly Administered)
)	
Debtor.)	
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SCOTT L. BAENA, LITIGATION TRUSTEE)	
OF THE LERNOUT & HAUSPIE SPEECH)	
PRODUCTS N.V. LITIGATION TRUST,)	
)	Adv. Pro. No. 04-54842 (JHW)
Plaintiff,)	
v.)	
)	
KPMG LLP and KLYNFELD PEAT MARWICK)	
GOERDELER BEDRIJFREVISOREN,)	
)	
Defendants.)	
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**KPMG LLP'S CROSS-MOTION FOR EXPEDITED CONSIDERATION OF TRANSFER
MOTION AND FOR ENLARGEMENT OF TIME TO RESPOND TO THE COMPLAINT**

Defendant KPMG LLP ("KPMG US" or "Defendant") by its undersigned counsel, hereby moves this Court for a for an order (i) allowing the Court to consider KPMG US's motion filed on October 4, 2004 for a transfer of the venue of this adversary proceeding to the United States District Court for District of Massachusetts, pursuant to 28 U.S.C. § 1404(a), 28 U.S.C. § 1412, and Federal Rule of Bankruptcy Procedure 7087 (the "Transfer Motion"), including deciding the Transfer Motion prior to filing of and briefing of any motions to dismiss, and (ii) enlarging KPMG US's time to respond to the Complaint until ten (10) business days after decision on the Transfer Motion.

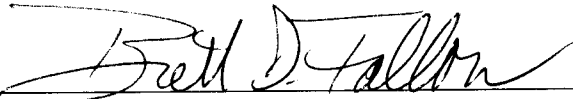
The Transfer Motion was filed on October 4, 2004. Any response to that motion is currently due on October 19, 2004. The Transfer Motion is currently the only substantive

motion pending before the Court in this matter. Instituting a procedure that allows the Court to decide the Transfer Motion first may obviate the need for this Court to decide any motions to dismiss, to the extent this Court transfers the action to the District of Massachusetts, where a number of other L&H-related actions are currently pending. These and other grounds for this motion are further detailed in the accompanying brief in support of KPMG US's cross-motion.

WHEREFORE, KPMG US respectfully requests this Court order that any response to the Transfer Motion be timely filed, decide the Transfer Motion before any motions to dismiss, and grant KPMG US's request to enlarge its time to respond to the Complaint until ten (10) business days after decision on the Transfer Motion.

Dated: October 18, 2004

MORRIS, JAMES, HITCHENS & WILLIAMS LLP



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